

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HAOYANG YU, *et al.*

No. 19-cr-10195-WGY

MOTION TO SUPPRESS EVIDENCE FROM WARRANTLESS SEARCH
AND REQUEST FOR EVIDENTIARY HEARING

At the request of federal law enforcement and to assist a federal criminal investigation, Analog Devices, Inc. (“ADI”) conducted an invasive digital search of Defendant Haoyang Yu’s computer, email, and network activity, nearly one year after his employment ended. This Court should hold an evidentiary hearing to determine whether the government can carry its burden to prove that this warrantless search was reasonable, *see United States v. D’Andrea*, 648 F.3d 1 (1st Cir. 2011), and if this Court decides the search was unreasonable, it should suppress all fruits of that search, *see United States v. Werra*, 638 F.3d 326 (1st Cir. 2011).

Respectfully submitted,

HAOYANG YU

by his attorneys,

/s/ William Fick

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 22, 2020.

/s/ William Fick